



THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL

ONE ASHBURTON PLACE
BOSTON, MASSACHUSETTS 02108

MAURA HEALEY
ATTORNEY GENERAL

TEL: (617) 727-2200
www.mass.gov/ago

January 11, 2016

Tom Frieden, M.D., M.P.H.
Director, Centers for Disease Control and Prevention
Debra Houry, M.D., M.P.H.
Director, National Center for Injury Prevention and Control
United States Centers for Disease Control and Prevention
1600 Clifton Road
Atlanta, GA 30329-4027

RE: *Docket CDC-2015-0112,*
Proposed 2016 Guideline for Prescribing Opioids for Chronic Pain

Dear Drs. Frieden and Houry,

I write to commend the work of the Centers for Disease Control and Prevention ("CDC") in preparing the draft Guideline for Prescribing Opioids for Chronic Pain ("Guideline") and urge the CDC to finalize the Guideline as soon as possible. The Guideline will provide much-needed information to primary care providers across the country about when and how opioids should be prescribed for chronic pain. While there have been various efforts from state officials and other organizations to memorialize best practices for opioid prescribing, the Guideline would provide prescribers with a single, nationwide, evidence-based standard.

The opiate epidemic has had a devastating impact in Massachusetts, as in so many other parts of the country. Deaths from opioid-related overdoses more than doubled in Massachusetts between 2011 and 2014, with more than 1,250 people believed to have died here in 2014.¹ According to SAMHSA, four out of five recent heroin initiates report having previously used a non-medical prescription pain reliever.² In Massachusetts alone, there were 4,664,391 prescriptions for Schedule II and III opioids in 2014.³ That is a prescription for nearly every adult in Massachusetts.

Our national opioid-related overdose deaths are the result of years of overprescribing of prescription painkillers. To significantly impact the trajectory of this epidemic, we need to change this country's culture around opioid prescribing. In the United States, we consume 80%

¹ Massachusetts Dept. of Public Health, Data Brief: Fatal Opioid-related Overdoses among Massachusetts Residents (Oct. 2015).

² SAMHSA, CBHSQ: Associations of Nonmedical Pain Reliever Use and Initiation of Heroin Use in the United States (Aug. 2013).

³ Massachusetts Dept. of Public Health, Board of Health Care Safety & Quality, Report (Nov. 5, 2015).




of the world's opioid supply. In 2014, the CDC reported that 18,893 people died from prescription opioid overdoses, a 16% increase from 2013.⁴ This is not just a heroin epidemic. There are more than three times as many Americans struggling with prescription opioid dependence or addiction as there are dealing with heroin addiction.

I strongly agree with CDC's conclusion that "[t]o reverse the epidemic of opioid drug overdose deaths and prevent opioid-related morbidity, efforts to improve safer prescribing of prescription opioids must be intensified."⁵ The draft Guideline is an important step toward intensifying those efforts. In particular, the Guideline makes clear that opioids should not be the initial treatment for chronic pain and should only be used where their benefits outweigh the risks. *See* Guideline No. 1. Equally important, the Guideline advises prescribers to evaluate the benefit and harms of opioid treatment within weeks of the initial dose and re-evaluate the patient at least every three months. *See* Guideline No. 7. Furthermore, "there are recent indications that prescription drug overdose deaths are declining in some jurisdictions, for instance Florida and Kentucky, likely due in part to the promulgation and increased use of PDMPs,"⁶ as indicated in Guideline No. 9. If finalized, the Guideline will provide much-needed information to prescribers nationwide.

Thank you for your continued work to address this public health crisis and help save lives. Please do not hesitate to contact Assistant Attorney General Eric Gold (617-963-2663) in my office if I can provide any additional information.

Very truly yours,



Maura Healey

⁴ CDC/NCHS, National Vital Statistics System, Mortality File *available at* http://www.cdc.gov/nchs/data/health_policy/AADR_drug_poisoning_involving_OA_Heroin_US_2000-2014.pdf

⁵ Rose A. Rudd et al., Increases in Drug and Opioid Overdose Deaths – United States, 2000-2014, 64 *Morb. Mortal. Wkly. Rep.* 1 (Dec. 18 2015).

⁶ PDMP Center of Excellence at Brandeis University, Briefing on PDMP Effectiveness at 3 (Sept. 2014).